

**IN THE UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

**IN RE: JASON E. NORNHOLD
DEBTOR**

**CASE NO.: 1:22-bk-00063
CHAPTER 13**

MOTION TO MODIFY CONFIRMED CHAPTER 13 PLAN

COMES NOW the Debtor, Jason E. Nornhold, by and through his Counsel, Nicholas G. Platt, and hereby moves the Court for authority to modify his Confirmed Chapter 13 Plan, and in support state:

1. On January 17, 2022, Debtor filed a voluntary petition for relief under Title 11, Chapter 13 of the Bankruptcy Code.
2. This Court has jurisdiction over the matters presented herein, which are core in nature, pursuant to 28 U.S.C. 157(b)(2)(A) and (L), 28 U.S.C. 1334, and 11 U.S.C. 1329.
3. On June 16, 2022, this Court confirmed Debtor's first Motion to Modify and 1st amended plan of reorganization.
4. Debtor is amending to surrender real property.
5. Debtor respectfully request the Court allow him to modify his Chapter 13 plan.

WHEREFORE, Debtor prays this Court allows him to modify his Chapter 13 plan and for all other just relief to which they are entitled.

Dated: January 23, 2023

/s/Nicholas G. Platt
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